



Order Filed on January 9, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Robertson, Anschutz & Schneid, PL
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487
Telephone No.: 973-575-0707 (local)
Telephone No.: 561-241-6901 (main)
Attorneys for Secured Creditor

Harold Kaplan (HK0226)

In Re:

Nancy M. Krimm,

Debtor.

Case No.: 18-17590-ABA

Chapter: 13

Hearing Date: January 14, 2020

Judge: Andrew B. Altenburg Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: January 9, 2020



Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

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Secured Creditor: Nationstar Mortgage LLC d/b/a Champion Mortgage Company

Secured Creditor's Counsel: Robertson, Anschutz & Schneid, P.L.

Debtors' Counsel: Richard S. Hoffman, Jr., Esq.

Property Involved ("Collateral"): 601 E. Academy Street, Clayton, NJ 08312

Relief sought:

- ☒ Motion for relief from the automatic stay
- ☐ Motion to dismiss
- ☐ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:
 - The Debtor has failed to maintain property taxes on the Collateral, forcing Secured Creditor to advance funds in the amount of \$8,881.50 for 2nd Quarter 2018 through and including 3rd Quarter 2019 taxes.

Funds Held In Suspense \$0.00
Total Arrearages Due \$8,881.50
2. Debtor must cure all post-petition arrearages, as follows:
 - A lump sum payment shall be made directly to Secured Creditor within 90 days of the entry of this Order in the amount of \$6,000.00.
 - Beginning on 01/01/2020, monthly cure payments shall be made in the amount of \$480.25 for 6 months to cure the remaining post-petition default of \$2,881.50.
 - Pursuant to the terms of Debtor's Reverse Mortgage, Debtor shall maintain home owner's insurance on the subject property, as well as make timely tax payments to the tax collector.
3. Payments to the Secured Creditor shall be made to the following address(es):
 - Lump sum payment: Champion Mortgage Company
P.O. Box 619093
Dallas, TX 75261

■ Monthly cure payment: Champion Mortgage Company
P.O. Box 619093
Dallas, TX 75261

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments and/or should any tax payment or insurance premium become more than thirty (30) days late, or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and the Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.


The fees and costs are payable:

■ Through the Chapter 13 plan.

☐ To the Secured Creditor within _____ days.

☐ Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.



Richard S. Hoffman, Jr., Esq.
Attorney for Debtor
Date: 1/7/2020

/s/ Harold Kaplan

Harold Kaplan, Esq.
Attorney for Secured Creditor
Date: 1/8/2020

Certificate of Notice Page 4 of 4

United States Bankruptcy Court
District of New JerseyIn re:
Nancy M. Krimm
DebtorCase No. 18-17590-ABA
Chapter 13**CERTIFICATE OF NOTICE**

District/off: 0312-1

User: admin
Form ID: pdf903Page 1 of 1
Total Noticed: 1

Date Rcvd: Jan 09, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 11, 2020.

db +Nancy M. Krimm, 601 E. Academy Street, Clayton, NJ 08312-1529

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jan 11, 2020

Signature: /s/Joseph Speetjens**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 9, 2020 at the address(es) listed below:

Harold N. Kaplan on behalf of Creditor Nationstar Mortgage LLC D/B/A Champion Mortgage Company hkaplan@rasnj.com, informationathnk@aol.com
 Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com
 Jason Brett Schwartz on behalf of Creditor Capital One Auto Finance, a division of Capital One, N.A. jschwartz@mesterschwartz.com
 Justin Plean on behalf of Creditor Nationstar Mortgage LLC D/B/A Champion Mortgage Company bkyecf@rasflaw.com, bkyecf@rasflaw.com;ras@ecf.courtdrive.com
 Laura M. Egerman on behalf of Creditor Nationstar Mortgage LLC bkyecf@rasflaw.com, bkyecf@rasflaw.com;legerman@rasnj.com
 Rebecca Ann Solarz on behalf of Creditor Nationstar HECM Acquisition Trust 2015-1, Wilmington Savings Fund Society, FSB, not individually, but solely as trustee rsolarz@kmlawgroup.com
 Richard S. Hoffman, Jr. on behalf of Debtor Nancy M. Krimm rshoffman@hoffmandimuzio.com, lmcevoy@hoffmandimuzio.com;jslachetka@hoffmandimuzio.com;hoffmanrr81909@notify.bestcase.com
 Sindi Mncina on behalf of Creditor Nationstar Mortgage LLC D/B/A Champion Mortgage Company smncina@rascrane.com
 U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 9